

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN DOE, et al.,

Plaintiffs,

v.

MOUNT VERNON CITY SCHOOL  
DISTRICT BOARD OF EDUCATION, et al.,

Defendants.

Case No. 2:08 CV 575

Judge Frost

Magistrate Judge King

**PLAINTIFFS' MOTION TO PLACE UNDER SEAL CERTAIN EXHIBITS  
FILED BY DEFENDANT JOHN FRESHWATER**

Plaintiffs Stephen and Jenifer Dennis, individually and as the natural parents and next friends of their minor child, ZD (the “Dennises”), hereby move the Court for an order to place under seal certain exhibits filed by Defendant John Freshwater (“Freshwater”). The documents in question include Exhibits 4 and 6 (Doc. Nos. 97-4 and 97-6) filed in support of Freshwater’s recent Reply to Document 96 – Reply to Plaintiffs’ Response to Defendant’s Motion for Continuance and Motion for Sanctions for Defendant’s Failure to Comply with This Court’s Discovery Orders (Doc. No. 97). These documents should be placed under seal because they disclose confidential settlement information in violation of the Local Rules. S.D. Ohio Civ. R. 16.3(c). To prevent these documents from being made part of the public record, therefore, the Dennises respectfully request that the Court issue the proposed attached order to place the documents under seal.

Respectfully submitted,

s/ Douglas M. Mansfield

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2010, I electronically filed the foregoing Motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following at his e-mail address on file with the Court:

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*Counsel for Defendant John Freshwater*

s/ Douglas M. Mansfield  
Douglas M. Mansfield

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**ORDER PLACING CERTAIN EXHIBITS FILED BY  
DEFENDANT JOHN FRESHWATER UNDER SEAL**

Plaintiffs' Motion to Place Under Seal Certain Exhibits Filed by Defendant John Freshwater, Doc. No. 99, is GRANTED with respect to Exhibits 4 and 6 (Doc. Nos. 97-4 and 97-6) filed in support of Defendant John Freshwater's Reply to Document 96 – Reply to Plaintiffs' Response to Defendant's Motion for Continuance and Motion for Sanctions for Defendant's Failure to Comply with This Court's Discovery Orders (Doc. No. 97).

**IT IS SO ORDERED.**

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GREGORY L. FROST  
UNITED STATES DISTRICT JUDGE